

JACQUES G. BRONZE, ESQ.

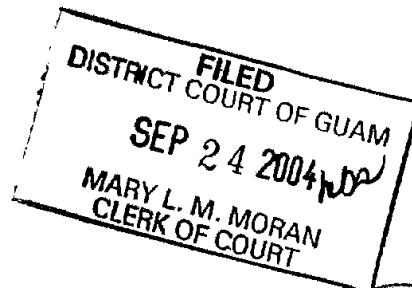
LAW OFFICES OF BRONZE & TANG

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001
Facsimile: (671) 647-7671

RICHARD A. PIPES, ESQ.

LAW OFFICES OF RICHARD A. PIPES

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001



288

Attorneys for Defendant Hongkong and Shanghai Banking Corporation, Ltd.

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**MOTION AND MEMORANDUM
OF POINTS AND AUTHORITIES
IN SUPPORT OF *EX PARTE*
APPLICATION OF HSBC**

The Hongkong and Shanghai Banking Corporation, Ltd. ("HSBC"), hereby applies to this Court *ex parte* for an order admitting Peter S. Modlin, from the firm of Farella Braun & Martel LLP, *pro hac vice* in this case. This Court has jurisdiction to hear this application pursuant to LR 7.1(j).

ORIGINAL

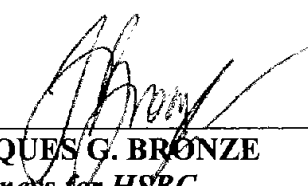
As set forth in the Declaration of Jacques G. Bronze, HSBC has given notice to Plaintiffs' counsel.

This application is based on this application, Declaration of Jacques G. Bronze, Declaration of Peter S. Modlin, and all pleadings, papers and evidence as will be submitted in connection with this application of hearing.

DATED this 24 day of September 2004.

LAW OFFICES OF BRONZE & TANG
A Professional Corporation

By: _____


JACQUES G. BRONZE
Attorneys for HSBC